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1 1. I was retained as Trustee of the PG&E Fire Victim Trust (“**Trustee**”) by Order of
2 this Court dated April 14, 2020 [Docket No. 6760]. I am duly authorized to make this Declaration
3 (the “**Declaration**”) on behalf of the PG&E Fire Victim Trust (the “**Trust**,” and its beneficiaries,
4 the “**Fire Victims**”). Unless otherwise stated in this Declaration, I have knowledge of the facts set
5 forth herein and, if called as a witness, I would testify thereto.

6 2. I am a former justice of the California Court of Appeals. Since retiring from the
7 bench in 1987, I have served as a Special Master in several Multi District Litigation
8 Pharmaceutical matters and other complex cases in both federal and state court, including
9 supervising the resolution of the wildfire victim claims resulting from the Witch Creek Fire and
10 the Rice Canyon Fire caused by San Diego Gas & Electric power lines in 2007.

11 3. I submit this Declaration in support of the *Motion of Fire Victim Trustee to File*
12 *Redacted Version of Share Exchange and Tax Matters Agreement*, filed concurrently herewith,
13 which seeks authority to redact certain confidential and sensitive commercial information
14 appearing in the schedules to the PG&E Fire Victim Trust Share Exchange and Tax Matters
15 Agreement dated as of July 8, 2021 (including all annexes, exhibits, and schedules, the “**Share**
16 **Exchange Agreement**”) filed with the Court and posted to the Fire Victim Trust Website in
17 accordance with the *Order Granting Joint Motion of Fire Victim Trustee and Reorganized Debtors*
18 *Regarding Exchange Transaction in Support of a Grantor Trust Tax Election* [Docket No. 10598].

19 4. I am generally knowledgeable and familiar with the day-to-day operations of the
20 Trust, including the Trust’s entry into the Share Exchange Agreement. I am authorized to submit
21 this Declaration on behalf of the Trust.

22 5. The facts set forth in this Declaration are based upon my personal knowledge, my
23 review of relevant documents, and information provided to me by the Trust’s legal and financial
24 advisors. If called upon to testify, I would testify to the facts set forth in this Declaration.

25 6. Much of the information set forth in the annex and certain of the schedules attached
26 to the Share Exchange Agreement is subject to a Confidentiality Agreement between PG&E and
27 the Trust or is otherwise highly confidential and sensitive information that could be used to
28 facilitate actions that could be damaging to one or more of the Share Exchange Participants if

1 publicly disclosed (the “**Sensitive Information**”). For these reasons, I believe it is in the best
2 interests of the Share Exchange Participants and the Trust’s beneficiaries, the Fire Victims, that the
3 Sensitive Information be redacted from the publicly filed and posted version of the Share
4 Exchange Agreement.

5 7. I respectfully submit that the Sensitive Information is not necessary for outside
6 parties to gain a full understanding of the Share Exchange Agreement, and therefore I believe it is
7 in the best interests of the Trust and the other Share Exchange Participants that the redacted
8 portions of the Schedules be kept confidential.

9 I declare under penalty of perjury, as set forth in 28 U.S.C. § 1746, that the foregoing is
10 true and correct to the best of my knowledge, information, and belief.

11 Executed this 9th day of July 2021, in Santa Ana, California.

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13 By: 

14 Hon. John K. Trotter (Ret.), in his capacity as
15 Trustee of the PG&E Fire Victim Trust
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